



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 19, 2014

14-NWP-172

Mr. Kevin Smith, Manager
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United States Department of Energy
PO Box 450, MSIN: H6-60
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Mr. Doug Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Revised Nuclear Waste Program Guidance for Assessing Security Requirements in the Draft Hanford Facility Dangerous Waste Permit Revision 9 – WA7890008967, (Security Requirements - Conceptual Agreement Package), August 2014

Reference: See page 2

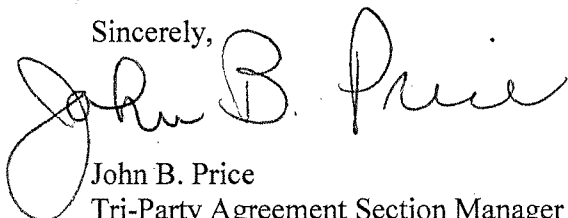
Dear Mr. Smith and Mr. Shoop:

The Department of Ecology (Ecology) transmitted the Security Requirements Conceptual Agreement Package (CAP) dated June 5, 2014, with our referenced letter. Formatting and administrative changes were made to the Security Requirements CAP. A revised copy of the Security Requirements CAP dated August 2014 is enclosed. Ecology will use this Security Requirements CAP to review the draft *Hanford Facility Dangerous Waste Permit, Revision 9*. In accordance with the Agreed Order No. DE-10156, Exhibit A, Section 1.12.1:

“Within fourteen months after Ecology’s transmittal of the Conceptual Agreement Packages to USDOE, USDOE agrees to submit to Ecology a Class 3 permit modification request to incorporate the SWOC Unit Groups into the Hanford Dangerous Waste Permit.”

If there are any questions regarding this letter, please contact me at john.price@ecy.wa.gov or (509) 372-7921. If there are any questions regarding the Security Requirements CAP, please contact Kelly Elsethagen, Site-wide Permit Revision 9 Permit Coordinator, at kelly.elsethagen@ecy.wa.gov or (509) 372-7913.

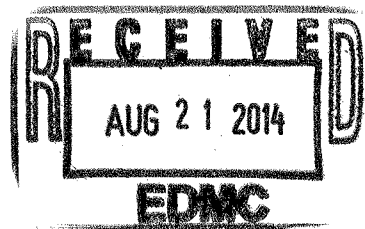
Sincerely,



John B. Price
Tri-Party Agreement Section Manager
Nuclear Waste Program

ke/jc
Enclosure

cc: See page 2



Mr. Smith and Mr. Shoop
August 19, 2014
Page 2

14-NWP-172

Reference: Letter 14-NWP-153, July 24, 2014, from J.B. Price, Ecology, to K. Smith, USDOE-ORP, and D. Shoop, USDOE-RL, "*Nuclear Waste Program Guidance for Assessing Security Requirements in the Draft Hanford Dangerous Waste Permit, Revision 9 – WA7890008967 (Security Requirements Conceptual Agreement Package)*"

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Administrative Record: Hanford Facility Wide Permit

**NUCLEAR WASTE PROGRAM GUIDANCE FOR ASSESSING
SECURITY REQUIREMENTS
IN THE DRAFT HANFORD FACILITY DANGEROUS WASTE PERMIT
REVISION 9 – WA7890008967**

(Security Requirements - Conceptual Agreement Package)

August 2014

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1. OBJECTIVE

The purpose of the Conceptual Agreement Packages (CAPs) is to provide guidance to Nuclear Waste Program (NWP) permit writers for reviewing the current *Draft Hanford Facility Dangerous Waste Permit*, Permit Number WA 7890008967, Revision 9 (the Permit), and associated permit application materials.

The CAPs will aid the permit writers in identifying deficiencies and completing comment responses. The CAPs also provide guidance for development of a revised Permit that will meet the NWP permitting criteria.

This CAP addresses security requirements that apply to the Hanford Facility, which includes, but is not limited to, individual dangerous waste management units (DWMUs).

2. NWP PERMITTING CRITERIA

Revisions to the Permit must meet the permitting criteria listed below. Once revisions are completed, the NWP will have a Permit that is:

- **Equivalent** - Ensures compliance with the Dangerous Waste Regulations, Chapter 173-303 Washington Administrative Code (WAC), and ensures protection of human health and the environment.
- **Consistent** - Applies regulations consistently throughout the Permit and across the entire authorized Washington State Dangerous Waste program.
- **Enforceable** - Provides clear and specific requirements in the permit conditions.
- **Implementable** - Ensures permit requirements reflect facility conditions and permitted activities.

By using the CAPs, the permitting criteria will be met in the following ways:

Equivalent

The CAPs provide guidance to reviewers of the Permit conditions, addenda, and the corresponding permit application components, to verify the Permit meets all applicable Dangerous Waste Regulations and protects human health and the environment.

Each CAP includes a topic-specific mapping of the Dangerous Waste Regulations that identifies where requirements are addressed in the Permit multi-tier structure.

Consistent

Each CAP includes a topic-specific checklist for permit writers to follow, fill out, and submit to the Site-wide Permit Coordinator. The checklist will be used to document adherence to NWP permit criteria or to document inconsistencies that will require revision before reissuing the final permit.

To ensure consistency with the Washington State Dangerous Waste Program, the CAPs are based on both the Dangerous Waste Regulations and the Washington State Department of Ecology's Dangerous Waste Permit Application Requirements (Publication # 95-402) guidance, as well as other applicable state and federal guidance.

Enforceable

The CAPs provide guidance for writing enforceable permit conditions and text, and indicate how references within the permit are properly incorporated.

Implementable

The CAPs provide guidance on writing clear and specific permit conditions and text that reflect actual facility conditions and describe the permitted dangerous waste management activities. With such conditions, permittee compliance obligations will be clearly identified, enhancing Ecology's ability to evaluate permittee compliance status.

3. HANFORD SITE DANGEROUS WASTE PERMIT STRUCTURE

The Hanford Site is one dangerous waste facility, with one dangerous waste permit. The current Hanford Site dangerous waste permit is titled the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, for the Treatment, Storage and Disposal of Dangerous Waste*, Permit Number WA7890008967, Revision 8C.

When the permit is reissued, the title will change to the *Hanford Facility Dangerous Waste Permit*, Permit Number WA7890008967, Revision 9.

The Site has multiple DWMUs that treat, store, or dispose of dangerous or mixed waste; are closing; are closed; or are in post-closure. The DWMUs are organized administratively in the Permit into multiple "unit groups," that are individual "chapters."

The structure is tiered into six main parts as described below:

- **Part I** contains standard conditions found in all dangerous waste permits in the state of Washington. Part I also contains some conditions related to Hanford-specific legal agreements and circumstances.
- **Part II** contains general conditions specific to the Site that apply to the facility as a whole.
- **Part III** contains operating unit group permit chapters for DWMUs that are still operating.¹ Each permit chapter contains:
 - Conditions specific to DWMUs in the unit group.
 - Addenda containing: Part A, waste analysis plan, process information, groundwater monitoring plan (if applicable), security, preparedness and prevention, contingency plan, training, inspection plan, closure plan, and post-closure plan (if applicable).
- **Part IV** contains conditions specific to corrective action for releases from solid waste management units, including releases to groundwater that are addressed on a groundwater operable unit basis.

¹ Note that some operating unit groups may contain DWMUs that are closing or have closed, but remain in Part III with the respective operating unit group.

- **Part V** contains closure unit group permit chapters for DWMUs in unit groups undergoing closure². Each permit chapter contains:
 - Conditions specific to DWMUs in the unit group.
 - Addenda containing: Part A, groundwater monitoring plan (if applicable), process information/waste characteristics, security, training, inspection plan, closure plan, post-closure plan (if applicable).³
- **Part VI** contains conditions specific to DWMUs in unit groups that have been closed with waste in place. Each permit chapter contains:
 - Conditions specific to DWMUs in the unit group,
 - Addenda containing: Part A, groundwater monitoring plan, security, training, inspection plan, post-closure plan.⁴

The descriptions of the various Parts are general descriptions, and there are exceptions. For example, the Purex chapter of the Permit is in Part V, but operating authorization for the Purex tunnels appears in this Part B chapter rather than in Part III.

In addition, the Permit has several attachments containing information applicable at the Site level. These attachments satisfy in part WAC 173-303 regulatory requirements. (For example, Attachment 4, DOE/RL-94-02, *Hanford Emergency Management Plan* satisfies in part the contingency plan requirements of WAC 173-303-350.)

Together, the Permit conditions, addenda, and attachments will meet the Dangerous Waste Regulations, Chapter 173-303 WAC.

4. HANFORD-SPECIFIC AND OTHER GUIDANCE

The following sections discuss the location of security requirements in the Permit structure; applicability of these requirements to DWMU's in operating, closing, and post-closure unit groups; Hanford-specific differences related to security requirements; applicable State and Federal guidance; and conceptual agreements reached in workshops with the U.S. Environmental Protection Agency and Ecology's Hazardous Waste and Toxics Reduction Program.

4.1 Security Requirements in the Permit Structure

The security requirements for DWMUs in operating, closure, and post-closure unit groups are contained in the following Permit conditions and addenda:

- Permit Attachment 3, Security (applicable at the Site level)
- Permit Condition II.L, Security

² Note that some closure unit groups may contain DWMUs that are operating, but remain in Part V with the respective closure unit group.

³ Some information normally provided in separate addenda, (e.g., training, security, inspections, process information/waste characteristics) may be rolled into the closure plan.

⁴ Some information normally provided in separate addenda, (e.g., training, security, inspections) may be rolled into the post-closure plan.

- Permit conditions specific to security in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group permit chapters
- Addendum E – Security, located in Operating (Part III) unit group permit chapters
- Security requirements for some closure or post-closure unit groups are addressed in the closure plan (Addendum H) or post-closure plan (Addendum K), respectively

4.2 Applicability of Security Requirements to DWMUs in Unit Groups

The Security CAP is applicable to the Hanford Facility as a whole; to all operating DWMUs where treatment, storage, or disposal of dangerous/mixed waste occurs; and at DWMUs where treatment, storage, or disposal of dangerous/mixed waste has occurred and security measures are still required.

WAC 173-303-310(1) requires the owner or operator to prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the facility. WAC 173-303-310(2) details specific requirements applicable to the active portion.

- Signs posted at each entrance to the active portion, and at other location, in sufficient numbers to be seen from any approach to the active portion. Signs must bear the legend, “Danger-unauthorized personnel keep out,” or an equivalent legend, written in English, and must be legible from a distance of twenty-five feet or more; and either
 - A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or
 - An artificial or natural barrier, or a combination of both, which completely surrounds the active portion of the facility, with a means to control access through gates or other entrances to the active portion of the facility at all times.

In addition, per WAC 173-303-610(7)(c), Ecology may require continuation of the security requirements of WAC 173-303-310 during part or all of the post closure period, when:

- Dangerous wastes may remain exposed after completion of partial or final closure; or
- Access by the public or domestic livestock may pose a hazard to human health.

A description of the security procedures and equipment required by WAC 173-303-310 is to be submitted to Ecology in the permit application, in accordance with WAC 173-303-806(4)(a)(iv). If the permittee requests a waiver from this requirement, it must be provided in the permit application, along with the reasons for requesting the waiver.

4.3 Hanford Differences for Security Requirements

The following section on Hanford differences for security requirements discusses issues in a problem statement, discussion, and resolution format.

Permit Attachment 3 details the Hanford security process. The entire Hanford Facility is a controlled access area with a 24-hour surveillance and access control system for protection of government property. The Hanford Patrol maintains a continuous presence of protective force personnel to provide security.

1. How should reference to the 'waiver' language be addressed?

Problem Statement: Some unit group Security Addenda discuss the non-applicability of the demonstration criteria in WAC 173-303-310(1)(a)-(b), as a waiver of security requirements has not been requested per WAC 173-303-806(4)(a)(iv).

Discussion: Except for the Integrated Disposal Facility, the double-shell tanks, and the Waste Encapsulation and Storage Facility, all Part III – Operating Units have a section in the Unit Group Security Addendum E discussing the fact that a waiver has not been requested and, therefore, the requirements of WAC 173-303-310(1)(a) and (b) are not applicable. For consistency, should text about the waiver be included or excluded?

Resolution: Remove the waiver language, as it does not need to be discussed unless it was requested by the permittee in the permit application and approved by Ecology. Use consistent language if the security waiver is requested and approved in the revised Permit.

2. Need for consistent permit structure and adequate individual DWMU security information.

Problem Statement: The permit structure for describing security requirements that apply to individual DWMUs is not consistent. Also, much of the information contained in unit group security addenda is a repeat of information contained in Attachment 3, with very little additional information. In most cases, specific information on security for individual DWMUs is not provided.

Discussion: Security requirements that apply to the Hanford Site overall are contained in Permit Attachment 3 and Permit Condition II.L, Security. Security requirements that apply to individual DWMUs are contained in several places, as noted below. Also, Permit Attachment 3 states that in addition to the information described in it, additional security information is located in unit-specific permit conditions, with no reference to Addendum E. This results in an inconsistent permit structure.

- Operating unit group chapters describe security requirements applicable to individual DWMUs in Addendum E and chapter permit conditions.
- Closure/post-closure unit group chapters describe security requirements in chapter permit conditions and/or closure plans/post-closure plans. All but one marks Addendum E in their unit group chapter as “Reserved.”
- The Waste Treatment and Immobilization Plant (Operating Unit Group 10) includes security requirements in Addendum E, Procedures to Prevent Hazards, consistent with 95-402 State permit application guidance.

A second problem is that much of the information contained in unit group security addenda is simply a repeat of information contained in Attachment 3, with very little additional information on individual DWMUs.

Resolution: The U.S. Department of Energy will review and update Permit Attachment 3, with Ecology approval, to address only security requirements that are applicable facility-wide. Ecology will revise text in Permit Condition I.L. as necessary.

Individual unit group Addendum E will contain only requirements applicable to the specific DWMUs within the unit group.

Ecology will review unit group security permit conditions for consistency and applicability.

The WTP Operating Unit will remain as currently written, and Addendum E will remain titled as "Procedures to Prevent Hazards."

4.4 Applicable State and Federal Guidance

The following State and Federal guidance are applicable to development of security requirements in the Permit:

- Dangerous Waste Permit Application Requirements, Ecology Publication #95-402

4.5 Conceptual Agreements

Currently there are no conceptual agreements with the Environmental Protection Agency or Ecology's Hazardous Waste and Toxics Reduction regional office related to security requirements.

5. UNIT-SPECIFIC REQUIREMENT CHECKLIST FOR SECURITY

Use following checklist to complete the Regulatory Matrix Map and Deficiencies/Solutions Table in Section 7. An example table is contained in Section 6.

| | |
|--|---|
| Permitted Unit Group: | Date: |
| Name of Person Completing the Checklist: | Note: Submit this checklist to the site-wide permit coordinator. |

5.1 Security Requirements Checklist

| Checklist Question |
|---|
| <p>Note: For the following checklist questions, in the comments column, please identify where in your unit group chapter the information demonstrating compliance with the regulatory requirement is located (i.e., unit group permit conditions, Addendum E (Security), Addendum H (Closure Plan), Addendum K (Post-Closure Plan).</p> |
| <p>1. Does your unit group permit chapter contain language discussing that a waiver of the security requirements in WAC 173-303-310 has not been requested, therefore the requirements of WAC 173-303-310(1)(a) and (b) are not applicable? If yes, please note in the comments column that this language will be removed. [WAC 173-303-310(1)(a)-(b)]</p> <p>Note: It is not necessary to state in the permit that these requirements do not apply.</p> |
| <p>2. Applicability for post-closure unit groups: For post-closure unit groups, security requirements may apply if:</p> <ul style="list-style-type: none"> • Dangerous wastes remain exposed after completion of partial or final closure; or • Access by the public or domestic livestock may pose a hazard to human health. [WAC 173-303-610(7)(c)] <p>Evaluate the closure information for the DWMUs in your post-closure unit group. If you have determined security requirements should continue to apply, complete the remaining checklist questions. If you have determined security requirements do not apply to any of the DWMUs in your post-closure unit group, mark N/A for the remainder of the checklist questions.</p> |

Checklist Question

3. Does your unit group permit chapter describe which areas are considered active portions? In general, an active portion will be an operating or unclosed DWMU.

Note: “Active portion” means that portion of a facility which is not a closed portion, and where dangerous waste recycling, reuse, reclamation, transfer, treatment, storage or disposal operations are being or have been conducted after: The effective date of the waste’s designation by 40 CFR Part 261; and March 10, 1982, for waste designated only by this chapter and not designated by 40 CFR Part 261. (See also “closed portion” and “inactive portion” defined in WAC 173-303-040.

4. Does your unit group permit chapter describe how the unknowing entry or the possibility for unauthorized entry of persons or livestock onto the active portions of the unit group is prevented?

[WAC 173-303-310(1)]

For example:

- Is the DWMU(s) located behind a fence (include type, height, gates, etc.).
- Are there other types of access to the DWMU(s) such as through a trailer or other structure?
- Is the DWMU(s) located inside a building or other structure?
- How are entrances to the DWMU(s) controlled (locked gate, locked door, prox card access, etc.)?
- Is key access to the DWMU(s) controlled?
- Is there specific training required in order to access an area with DWMU(s)?

5. Does your unit group permit chapter describe the type(s) of warning signs used? [WAC 173-303-310(2)(a)]

Note: Signs need to state in English “Danger – unauthorized personnel keep out” or an equivalent legend. If an equivalent legend is used, it should be described in the permit chapter.

6. Does your unit group permit chapter describe by specific location where the “Danger – unauthorized personnel keep out” signs are posted?

[WAC 173-303-310(2)(a)]

Note: Signs are required to be posted at each entrance to an active portion, and at other locations, in sufficient numbers to be seen from a distance of 25 feet and from any angle of approach.

Checklist Question

7. Does your unit group permit chapter describe either a 24-hour surveillance system or a barrier and means to control entry onto the active portion of the unit group?

[WAC 173-303-310(2)(b)-(c)]

Note: Examples of surveillance systems include television monitoring or surveillance by guards or facility personnel. The barrier can be artificial (e.g., fence, building) or natural (e.g., cliff), or a combination of both, and must completely surround the DWMU(s) in the unit group. Examples of "means to control entry" include an attendant, television monitors, locked entrance, or controlled roadway access to the facility.

6. EXAMPLE: REGULATORY MATRIX MAP OF SECURITY REQUIREMENTS AND DEFICIENCIES/SOLUTIONS TABLE FOR 242-A EVAPORATOR OPERATING UNIT GROUP 4

| WAC 173-303-310, Security | Requirement location in Draft Rev. 9 Permit | Check-list Question # | Conceptual Agreement (See Section 4.5 Table) | Focus Group Topic | DWMU(S) (Simple text only. No formatting or hard returns) | Does your Add. E meet requirement yes, no (Y, N) OR not applicable (N/A) | Deficiency (summary) (Simple text only. No formatting or hard returns) | Proposed Solutions (summary) (Simple text only. No formatting or hard returns) | Comments (Simple text only. No formatting or hard returns) |
|--|--|-----------------------|--|-------------------|---|--|---|--|--|
| -310(1) The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his or her facility, unless he can demonstrate to the department that: | Permit Att. 3, Add. E | 1, 3, 4 | N/A | N/A | 242-A Example: C-A-1 evaporator vessel tank system; C-100 condensate collection tank system | N | 242-A Example: Add. E does not provide any details on the active portions of the unit group, or how entry is prevented into these areas (i.e., into the 242-A building or the rooms where tank systems are housed). | 242-A Example: Obtain details on access to the 242-A building and/or rooms where tank systems are located. | 242-A Example: No detail was provided in Add. E, and it refers to Permit Att. 3 only. |
| -310(1)(a) Physical contact with waste, structures, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of the facility. | N/A | 1 | N/A | N/A | N/A | N/A | N/A | N/A | Add. E, Section E.1.1 contains waiver language that will be removed, as a waiver to security requirements for 242-A active portions was not requested. |
| -310(1)(b) Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of the facility will not cause a violation of this chapter 173-303 WAC | N/A | 1 | N/A | N/A | N/A | N/A | N/A | N/A | Add. E, Section E.1.1 contains waiver language that will be removed, as a waiver to security requirements for 242-A active portions was not requested. |
| -310(2) A facility must have: (a) Signs posted at each entrance to the active portion, and at other locations, in sufficient numbers to be seen from any approach to the active portion. Signs must bear the legend, "Danger – unauthorized personnel keep out," or an equivalent legend, written in English, and must be legible from a distance of twenty-five feet or more; and either | Permit Condition II.L, Permit Att. 3, Unit Group Permit Conditions, Add. E | 5, 6 | N/A | N/A | 242-A Example: C-A-1 evaporator vessel tank system; C-100 condensate collection tank system | N | 242-A Example: Add. E does not provide any details on warning signs at entrances into active portions of the 242-A building. | 242-A Example: Obtain details on where warning signs are posted, if the signs bear the standard legend or an equivalent, if they are visible from a distance of 25 feet. | 242-A Example: No detail was provided in Add. E, and it refers to Permit Att. 3 only. |

| WAC 173-303-310, Security | Requirement location in Draft Rev. 9 Permit | Check-list Question # | Conceptual Agreement (See Section 4.5 Table) | Focus Group Topic | DWMU(S) (Simple text only. No formatting or hard returns) | Does your Add. E meet requirement yes, no (Y, N) OR not applicable (N/A) | Deficiency (summary) (Simple text only. No formatting or hard returns) | Proposed Solutions (summary) (Simple text only. No formatting or hard returns) | Comments (Simple text only. No formatting or hard returns) |
|--|---|-----------------------|--|-------------------|---|--|--|---|---|
| -310(2)(b) A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or | Permit Condition I.L, Permit Att. 3, Unit Group Permit Conditions, Add. E | 7 | N/A | N/A | 242-A Example: C-A-1 evaporator vessel tank system; C-100 condensate collection tank system | N | 242-A Example: Add. E does not provide any details on whether or not a 24-hour surveillance system is used. | 242-A Example: Obtain on whether or not a 24-hour surveillance system is used. | 242-A Example: No detail was provided in Add. E, and it refers to Permit Att. 3 only. |
| -310(2)(c) An artificial or natural barrier, or a combination of both, which completely surrounds the active portion of the facility, with a means to control access through gates or other entrances to the active portion of the facility at all times. | Permit Condition I.L, Permit Att. 3, Unit Group Permit Conditions, Add. E | 7 | N/A | N/A | 242-A Example: C-A-1 evaporator vessel tank system; C-100 condensate collection tank system | N | 242-A Example: Add. E does not provide any details on artificial or natural barriers preventing access to the active portion of the unit group or on access control. | 242-A Example: Obtain details on artificial barriers to the active portions (i.e., 242-A building itself or rooms where tank systems are housed), and details on access control (e.g., locked doors, key control etc.). | 242-A Example: No detail was provided in Add. E, and it refers to Permit Att. 3 only. |
| -310(3) In lieu of WAC 173-303-310(2), above, the owner or operator of a totally enclosed treatment facility or an elementary neutralization or wastewater treatment unit (as defined by WAC 173-303-040) must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock into or onto the totally enclosed treatment facility of the elementary neutralization or wastewater treatment unit. | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Currently not applicable to any unit-groups at Hanford. |

| WAC 173-303-310, Security | Requirement location in Draft Rev. 9 Permit | Check-list Question # | Conceptual Agreement (See Section 4.5 Table) | Focus Group Topic | DWMU(S) (Simple text only. No formatting or hard returns) | Does your Add. E meet requirement yes, no (Y, N) <u>OR</u> not applicable (N/A) | Deficiency (summary) (Simple text only. No formatting or hard returns) | Proposed Solutions (summary) (Simple text only. No formatting or hard returns) | Comments (Simple text only. No formatting or hard returns) |
|--|---|-----------------------|--|-------------------|---|---|--|--|--|
| WAC 173-303-610(7)(c) The department may require, at partial or final closure, continuation of any of the security requirements of WAC 173-303-310 during part of all of the post-closure period when: (i) Dangerous wastes may remain exposed after completion of partial or final closure; or (ii) Access by the public or domestic livestock may pose a hazard to human health. | For post-closure DWMU applicability only. | 2 | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

7. REGULATORY MATRIX MAP OF SECURITY REQUIREMENTS AND DEFICIENCIES/SOLUTIONS TABLE FOR [INSERT UNIT GROUP]

| WAC 173-303-310, Security | Requirement location in Draft Rev. 9 Permit | Check-list Question # | Conceptual Agreement (See Section 4.5 Table) | Focus Group Topic | DWMU(S) (Simple text only. No formatting or hard returns) | Does your Add. E meet requirement yes, no (Y, N) OR not applicable (N/A) | Deficiency (summary) (Simple text only. No formatting or hard returns) | Proposed Solutions (summary) (Simple text only. No formatting or hard returns) | Comments (Simple text only. No formatting or hard returns) |
|--|--|-----------------------|--|-------------------|---|--|--|--|---|
| -310(1) The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his or her facility, unless he can demonstrate to the department that: | Permit Att. 3, Add. E | 1, 3, 4 | N/A | N/A | | | | | |
| -310(1)(a) Physical contact with waste, structures, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of the facility. | N/A | 1 | N/A | N/A | N/A | N/A | N/A | N/A | Note: No waiver requests were received, however note if reference to waiver language is contained in your Add. E. |
| -310(1)(b) Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of the facility will not cause a violation of this chapter 173-303 WAC | N/A | 1 | N/A | N/A | N/A | N/A | N/A | N/A | Note: No waiver requests were received, however note if reference to waiver language is contained in your Add. E. |
| -310(2) A facility must have: (a) Signs posted at each entrance to the active portion, and at other locations, in sufficient numbers to be seen from any approach to the active portion. Signs must bear the legend, "Danger – unauthorized personnel keep out," or an equivalent legend, written in English, and must be legible from a distance of twenty-five feet or more; and either | Permit Condition II.L, Permit Att. 3, Unit Group Permit Conditions, Add. E | 5, 6 | N/A | N/A | | | | | |
| -310(2)(b) A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or | Permit Condition II.L, Permit Att. 3, Unit Group Permit Conditions, Add. E | 7 | N/A | N/A | | | | | |

| WAC 173-303-310, Security | Requirement location in Draft Rev. 9 Permit | Check-list Question # | Conceptual Agreement (See Section 4.5 Table) | Focus Group Topic | DWMU(S) (Simple text only. No formatting or hard returns) | Does your Add. E meet requirement yes, no (Y, N) <u>OR</u> not applicable (N/A) | Deficiency (summary) (Simple text only. No formatting or hard returns) | Proposed Solutions (summary) (Simple text only. No formatting or hard returns) | Comments (Simple text only. No formatting or hard returns) |
|--|---|-----------------------|--|-------------------|---|---|--|--|--|
| -310(2)(c) An artificial or natural barrier, or a combination of both, which completely surrounds the active portion of the facility, with a means to control access through gates or other entrances to the active portion of the facility at all times. | Permit Condition ILL, Permit Att. 3, Unit Group Permit Conditions, Add. E | 7 | N/A | N/A | | | | | |
| -310(3) In lieu of WAC 173-303-310(2), above, the owner or operator of a totally enclosed treatment facility or an elementary neutralization or wastewater treatment unit (as defined by WAC 173-303-040) must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock into or onto the totally enclosed treatment facility of the elementary neutralization or wastewater treatment unit. | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Currently not applicable to any unit-groups at Hanford. |
| WAC 173-303-610(7)(c) The department may require, at partial or final closure, continuation of any of the security requirements of WAC 173-303-310 during part of all of the post-closure period when: (i) Dangerous wastes may remain exposed after completion of partial or final closure; or (ii) Access by the public or domestic livestock may pose a hazard to human health. | For post-closure DWMU applicability only. | 2 | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

8. CONSISTENCY TOOLS

The following checklist and Addenda E development guidance are consistency tools to be used in development of the revised Rev. 9 Permit. **This is FUTURE work, and does not need to be completed to support the NWP CAP workshop.**

8.1 Unit Specific Permit Conditions For All Unit Groups

| Checklist Question | Yes, No, N/A | Comments |
|--|--------------|----------|
| <p>1. For operating unit groups, check in your operating unit group permit chapter conditions. Is the title for Condition III.X⁵.E, “Security”?</p> <p>If No, please specify the title in the comments section.</p> | | |
| <p>2. For closure unit groups, check in your closure unit group permit chapter conditions. Is the title for Condition V.X⁶.E, “Security”?</p> <p>If No, please specify the title in the comments section.</p> | | |
| <p>3. For post-closure unit groups, security requirements may apply to your DWMU(s) if:</p> <ul style="list-style-type: none"> • Dangerous wastes remain exposed after completion of partial or final closure; or • Access by the public or domestic livestock may post a hazard to human health. [WAC 173-303-610(7)(c)] <p>If you have determined security requirements should continue to apply, check in your post-closure unit group permit chapter conditions. Is the title for Condition VI.X⁷.E, “Security”?</p> <p>Note: If you have determined security requirements do not apply to any of the DWMUs in your post-closure unit group, mark N/A for the remainder of the checklist questions.</p> | | |

⁵ The “X” will be the chapter number for your operating unit group. For example, the Waste Treatment and Immobilization Plant permit chapter is “10.”

⁶ The “X” will be the chapter number for your closure unit group. For example, the SST System permit chapter is “4.”

⁷ The “X” will be the chapter number for your post-closure unit group. For example, the 300 Area Process Trenches permit chapter is “1.”

| Checklist Question | Yes, No, N/A | Comments |
|---|-----------------|----------|
| <p>4. Check under your list of Addenda. Is Addendum E titled "Security"?</p> <p>If No, list the Addendum Title in the Comments Section, and indicate where in your permit chapter security requirements are addressed (e.g., permit conditions, closure plan, post-closure plan).</p> | | |
| <p>5. Does your unit group permit chapter contain a condition under "Security" that reads:</p> <p>"The Permittees will implement and maintain the security measures documented in [Addendum E, Security or Addendum H, Closure Plan or Addendum K, Post-Closure Plan], and Permit Condition II.L for active portions of the (enter specific Unit Group title) [WAC 173-303-310(2)] ."</p> <p>If No, note any alternate condition language in the comments section.</p> | | |
| <p>6. Does your unit group permit chapter contain a condition under "Security" that reads:</p> <p>"The Permittees will maintain warning signs at points described in [Addendum E, Security or Addendum H, Closure Plan or Addendum K, Post-Closure Plan] for the (insert Unit Group name), ensuring the signs are legible from a distance of 7.6 meters (25 feet), and visible from all angles of approach. [WAC 173-303-310(2)(a)]"</p> <p>If No, note any alternate condition language in the comments section.</p> | | |
| <p>7. Check throughout your unit group permit chapter conditions. Where Addendum E is referred to, is it consistently referenced as Addendum E, Security?</p> <p>If No, list the Addendum Title and locations where it is referenced in the Comments Section.</p> | | |

Unit Group Permit Conditions

Include the following permit conditions in the security section of your unit group permit conditions.

III, IV, or VI.X.E.1 “The Permittees will implement and maintain the security measures documented in [Addendum E, Security or Addendum H, Closure Plan or Addendum K, Post-Closure Plan], and Permit Condition II.L for active portions of the (enter specific Unit Group title) [WAC 173-303-310(2)].”

III, IV, or VI.X.E.2 “The Permittees will maintain barriers and warning signs at points described in [Addendum E, Security or Addendum H, Closure Plan or Addendum K, Post-Closure Plan] for the (insert Unit Group name), ensuring the signs are legible from a distance of 7.6 meters (25 feet), and visible from all angles of approach [WAC 173-303-310(2)(a)].”

Introductory Text for Security Requirements in Unit Group Chapters

Ensure the following text is included in the introduction section of your Addendum E, or in the security section of your closure plan or post-closure plan, as applicable. If the security information is provided in a closure plan or post-closure plan, the numbering will be different, but the level of detail should be the same.

E Security

Unknown entry and the possibility for unauthorized entry of persons or livestock onto the active portions of the [enter specific unit group title] is minimized through implementation and maintenance of security measures described in Permit Attachment 3 and this addendum [or closure plan/post-closure plan].

The detailed text of your Addendum E, or the security section of your closure plan or post-closure plan, should include the following details:

E.1 Security

The [insert unit group name] is located within the [insert specific location] Area of the Hanford Facility. The active portions of the [insert unit group name] include the following DWMUs and areas:

[Insert specific DWMUs and other areas meeting the WAC 173-303-040 definition of “active portion.”]

E.1.1 Access Control

Access is controlled for [Insert the DWMU title – DWMUs may be grouped together to meet security requirements] by [describe how access is controlled (beyond what is already described in Permit Attachment 3), i.e., artificial or natural barrier, 24 hour surveillance, which demonstrates compliance with WAC 173-303-310(2)(c)].

- Include information on natural (i.e., cliff face) or artificial barriers: fencing (include type, height, gates), buildings/structures, all entrances, etc.
- Include information on entrance control: controlled roadway access, locked gate, locked door, prox card access, only authorized/trained personnel have keys etc.

E.1.2 Warning Signs

Include information on type and location of “Danger” signs.

- The standard legend is “Danger – Unauthorized Personnel Keep Out.” If an equivalent legend is used, describe it.
- Describe where signs are posted. They are required to be posted at all entrances/access points and at other locations to the active portion so they are visible from 25 feet and from all angles of approach.